

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

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Alyssa Andreen,

Court File Number:

Plaintiff,

vs.

**SUMMONS**

Hobby Lobby Stores, Inc.,  
a foreign corporation,

Defendant.

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**THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:**

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this summons.

2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this summons located at: Keller, Woods & Thompson, P.A., 1300 Godward Street NE, Suite 4000, Minneapolis, MN 55413.

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the

**EXHIBIT**

**1**

Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

**KELLER, WOODS & THOMPSON, P.A.**

Dated: November 16, 2023

By: /s/ Andrew P. Sherwood  
Andrew P. Sherwood, 0296946  
Attorney for Plaintiff  
1300 Godward Street NE, Suite 4000  
Minneapolis, MN 55413  
(763) 571-2345  
andy@woodsandthompson.com

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

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Alyssa Andreen,

Court File Number:

Plaintiff,

**COMPLAINT**

vs.

Hobby Lobby Stores, Inc.,  
a foreign corporation,

Defendant.

---

Plaintiff, for her cause of action against Defendant named above, states and alleges as follows:

I.

Plaintiff Alyssa Andreen ("Plaintiff") is and was at all times material a resident of the City of St. Louis Park, County of Hennepin, State of Minnesota.

II.

Defendant Hobby Lobby Stores, Inc. ("Defendant") is and was at all times material herein and upon information and belief, a foreign corporation, incorporated in the State of Oklahoma, with executive offices located at 7707 SW 44<sup>th</sup>, Oklahoma City, OK 73179, and Corporation Service Center as its registered agent for service of process at 2345 Rice Street, Suite 230, Roseville, MN 55113.

III.

At all times material herein, Defendant Hobby Lobby Stores, Inc., owned, operated, controlled, and managed a retail store doing business in the City of Bloomington, County of

Hennepin, State of Minnesota with a store location address of 2600 American Boulevard West, Bloomington, Minnesota 55431.

IV.

That on September 2, 2019, Plaintiff was a customer and invited guest of Defendant's Bloomington, Minnesota retail store location and approached a display rack with various items for purchase when a large, heavy, and unsecure wooden art piece fell from the display rack and struck Plaintiff her on the head, knocking her to the floor.

V.

That Defendant, through either its employees, agents, or representatives, negligently placed the large, wooden art piece described herein on the display rack in a precarious and unsecure position where it created a hazardous condition for Plaintiff as she shopped at the Bloomington retail store location on September 2, 2019. Defendant, through either its employees, agents, or representatives, negligently failed to maintain its premises at the Bloomington retail store location in a safe condition when the precariously placed and unsecure large wooden art piece fell on Plaintiff's head, and such negligence directly and solely caused the September 2, 2019 incident described herein.

VI.

That as a direct and proximate result of the negligence of Defendant and its employees, agents, or representatives in causing the September 2, 2019 incident described herein, Plaintiff sustained severe and permanent injuries, including a traumatic brain injury and injury to her neck, incurred past medical expenses and income loss, experienced past pain, disability, and emotional

distress, and will in the future incur medical expenses and income loss, and experience future pain, disability, emotional distress, and loss of earning capacity.

VII.

Plaintiff, Andrew P. Sherwood, and KELLER, WOODS & THOMPSON, P.A., acknowledge that costs, disbursements, and reasonable attorney and witness fees may be awarded to Defendant, pursuant to Minn. Stat. § 549.211.

WHEREFORE, Plaintiff prays for judgment against Defendant Hobby Lobby Stores, Inc., in a sum exceeding Fifty Thousand and no/100 (\$50,000.00) Dollars, together with prejudgment interest, judgment interest, costs and disbursements, and such other and further relief as the Court deems just and equitable.

**KELLER, WOODS & THOMPSON, P.A.**

Dated: November 14, 2023

By: /s/ Andrew P. Sherwood  
Andrew P. Sherwood, 0296946  
Attorneys for Plaintiff  
1300 Godward Street NE, Suite 4000  
Minneapolis, MN 55413  
(763) 571-2345  
andy@woodsandthompson.com